SIDLEY AUSTIN BROWN & WOOD LLP

CHICAGO
DALLAS
LOS ANGELES
NEW YORK
SAN FRANCISCO

1501 K STREET, N.W.
WASHINGTON, D.C. 20005
TELEPHONE 202 736 8000
FACSIMILE 202 736 8711
www.sidley.com
FOUNDED 1866

BEIJING
GENEVA
HONG KONG
LONDON
SHANGHAI
SINGAPORE
TOKYO

WRITER'S DIRECT NUMBER

WRITER'S E-MAIL ADDRESS

December 10, 2002

By Electronic Filing

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: *Application by SBC Communications Inc., Pacific Bell Telephone Company, and Southwestern Bell Communications Services, Inc. for Provision of In-Region, InterLATA Services in California; WC Docket No. 02-306 -- Ex Parte Filing*

Dear Ms. Dortch:

At the request of Commission Staff, AT&T submits this *ex parte* letter to describe a new respect in which SBC's test environment fails to mirror the production environment and operates to deny CLECs nondiscriminatory access to SBC's operations support systems. This recent experience, which arises from AT&T's efforts to migrate its customers to facilities-based service, together with the other deficiencies in SBC's test environment that AT&T has previously described,[1] confirm that the problems in the test environment are systemic rather than isolated in nature, and are operating to delay competition, including facilities-based competition. Indeed, SBC Pacific has not given (and cannot give) AT&T any assurances that additional failures of the test environment to mirror production will not occur. As the latest example described herein shows, SBC's inadequate test environment is impeding AT&T's ability to migrate UNE-P customers to facilities-based service and to provide a competitive alternative to Pacific's monopoly over residential DSL service.

As part of its efforts to provide DSL service to California customers using AT&T's network and UNE loops, AT&T exercised a joint EDI test plan in September and October 2002 that contained a test case for the migration of existing AT&T customers from

[1] AT&T at 40-41 & Willard Decl., ¶ 33-42; AT&T Reply at 20-21 & Willard Reply Decl., ¶¶ 7-11; AT&T November 27 *ex parte*, Supplemental Willard Decl. ¶¶ 43-59.

service through the UNE platform to service through UNE loops. AT&T's test case was accepted and processed in Pacific's systems. However, when AT&T submitted such orders in actual commercial production, they were rejected on the grounds that the LSR contained a directory listing without requesting a modification to the listing – even though the test case, which was successful, contained the same type of information.[2]

On November 13, Pacific advised the Commission that it had implemented an "enhancement" (effective that same day) that removed an edit from LSOR version 3.06 so that "AT&T could replace main directory listing information on a migration of its existing customer without first removing the existing main listing." Thus, SBC Pacific stated, "AT&T should no longer receive a reject on this type of transaction in either the production environment or the test environment."[3]

Although the implementation of this "enhancement" appears to have ended the rejections of orders on the basis of the inclusion of directory listing information, *migration orders submitted in commercial production are now being rejected for a different reason, even though the same type of order was accepted and processed in the test environment*.

Specifically, in early October AT&T submitted an order in the test environment for the conversion of a customer from UNE-P POTS service to xDSL UNE loop service with local number portability ("LNP"). On this LSR, AT&T used Request Type "B" (UNE Loop with LNP) and an Activity Code of "V" (Conversion), as AT&T had specified in the test case description that it had previously provided to SBC Pacific.[4] Because this Request Type (REQTYP) and Activity are reflected in SBC/Pacific Bell's LSOR 3.06 as a valid combination, AT&T submitted a single LSR for this scenario.[5] AT&T received a firm order confirmation for the single LSR, and the order was completed.

---

[2]Willard Reply Decl., ¶¶ 7-11; Supplemental Willard Decl., ¶ 53.

[3]*Ex parte* letter from Geoffrey M. Klineberg to Marlene H. Dortch, dated November 13, 2002, Att. at 5; Supplemental Willard Decl., ¶ 58.

[4]*See* Supplemental Willard Decl., Att. 3, "Test Cases – UNE-L" at 6, Test Case 5.1 (describing UNE-P to UNE-L migration involving Request Type "B" and Activity Code "V"). *See also id.*, Att. 4 (test results provided by SBC), "Test Cases – UNE-L" at 7 (description of Test Case 5.1, with same Request Code and Activity Code).

[5] In the test environment, each ordering scenario is verified using a single test case. Previously, when AT&T's test plans have contained test cases that were nearly similar, SBC Pacific complained to AT&T about the number of test cases and asserted that AT&T should be able to successfully complete testing without duplicate or nearly duplicate test cases.

Because SBC Pacific claims that implementation of its November 13th "enhancement" prevents rejections of LSRs that include unchanged directory listings, these types of migration orders should have been successful when submitted in commercial production. Thus, on November 14, 15 & 19, AT&T submitted three commercial LSRs, each of which requested the conversion of a customer from UNE-P POTS service to xDSL UNE loop service with LNP. These three LSRs, like the LSR submitted in the test environment, used Request Type "B" and Activity Code "V."

Despite the similarity of the commercial LSRs to the LSR submitted in testing, all three of the commercial LSRs were *rejected.*[6] When AT&T notified SBC Pacific about these rejections, SBC Pacific responded that a single LSR cannot be used to migrate a customer from UNE-P to xDSL UNE loop service. Instead, SBC Pacific suggested, a CLEC must submit *two* LSRs – one LSR requesting that the UNE-P be disconnected, and a second LSR requesting a UNE loop with LNP – and that the CLEC must relate the two LSRs through the Related Purchase Order Number ("RPON") field of the two LSRs.[7]

SBC's rejection of AT&T's commercial migration orders is further proof that that SBC's test environment does not mirror the production environment. AT&T's use of a single LSR in commercial production to request the migration of a particular customer from UNE-P to xDSL UNE loop service was fully consistent with the approach that it followed in testing. SBC did not object to AT&T's test plan, provided to SBC in the summer of 2002, in which AT&T indicated, *inter alia*, that it planned to test the use of a single order for such migrations, even though SBC did comment on other aspects of the test plan. And as noted above, the order for such a migration that AT&T submitted in its actual test was successful. Indeed, AT&T's use of a single order for its commercial migrations was consistent not only with its successful testing of such orders with Pacific, but with AT&T's prior experience with SBC's operations supports systems.[8] When AT&T pointed out to an SBC Pacific account representative that the test scenario had completed successfully in the test environment, the account executive expressed

---

[6] AT&T originally submitted two of the LSRs on November 14, and the third LSR on November 15. When all those LSRs were rejected, AT&T resubmitted all three LSRs on November 19 – and they were again rejected.

[7] Pacific's own Local Service Ordering Rules indicate that the use of Request Type "B" with Activity Code "V" on an LSR is a valid combination.

[8] For example, AT&T successfully used a single LSR for UNE-P to UNE-L migrations in its extensive trial last year of SBC's interfaces in Texas. *See* "Executive Summary: UNE-P to UNE-L Conversion: Post Mortem of Manual Trial and User Requirements" (dated September 5, 2001), at 3, Section 3.1.9 (attached hereto as Attachment 1). Given that SBC is required to have uniform interfaces throughout its 13-state region, AT&T expected that it could also use such a single order in California.

surprise at AT&T's belief that the fact that the order passed in the test environment would mean that the order would be accepted in production, and concluded that this "may get down to nothing more than an oversight."[9] SBC has not yet explained why it did not cite the use of a single LSR as a cause for the rejection of the commercial orders submitted prior to November 13; at that time, SBC Pacific stated only that the orders were being rejected because they included directory listing information that was not being changed.

Of course, SBC Pacific's suggestion that AT&T's success in the test environment may reflect only an "oversight" would, if confirmed, simply provide more evidence that the test environment does not mirror production, because the single LSR that AT&T submitted in the test environment was *not* rejected, even though it reflected the same information as the single LSRs submitted in actual production. Furthermore, like the rejections of AT&T's LSRs that occurred prior to implementation of the November 13th "enhancement," the rejections of the three single LSRs submitted on November 14, 15, and 19 has delayed the launch of AT&T's voice and data offering using UNE loops and AT&T's own switching.[10] Because the rejection of these commercial LSRs submitted showed that the use of a single LSRs for such migrations would be rejected in production, AT&T decided not to send any more such orders to SBC Pacific until the problem is resolved.

AT&T's plan to offer voice and data service using UNE loops and AT&T's own switches is an integral part of its objectives of providing local exchange service through its own facilities, and of providing DSL service as part of a bundled package with local exchange service.[11] AT&T seeks to migrate its customers from the UNE-P to xDSL UNE loop service to support its DSL offering for consumers in California. AT&T had scheduled the introduction of this offering in California for January 2003. However, if AT&T is required to implement (and use) a two-LSR ordering process to avoid order rejections, the launch of that service will be delayed by at least *six months* because development of such a process would be an extremely costly, complex, and time-consuming task. Even if the two-order process works as intended, the experience of AT&T's test orders shows that, if there are additional reasons causing rejection of the order, AT&T will not learn them until it once again experiences order rejections in commercial production.

---

[9] Electronic mail message from Melonie Temple (SWBT) to Walter W. Willard (AT&T) and Arthur A. Weil (SBC Pacific), dated December 5, 2002 (attached hereto as Attachment 2).

[10] *See* Willard Reply Decl, ¶ 11 (describing the delay in AT&T's UNE-P to UNE-L migrations previously caused because migration orders were rejected in actual production on the ground that they included the customer's directory listing without requesting modification of the listing, until AT&T's systems -- which had provided for automatic inclusion of directory listing information -- could be modified).

[11] Willard Reply Decl., ¶ 7.

The delay caused by Pacific's "one-reason-at-a time" approach to identifying deficiencies in its test environment is particularly detrimental to California consumers in this instance. The CPUC found that "Pacific's DSL market dominance in California is increasing while its competitors' DSL market share is shrinking," and "the majority of California ratepayers have no provider choice other than Pacific for DSL access service,"[12] and Pacific's inadequate test environment is now delaying AT&T's ability to provide consumers an alternative to SBC Pacific's DSL service.

Both before and after SBC Pacific implemented its "enhancement" on November 13, AT&T's experience in the test environment led it to believe that its UNE-P to UNE-L migration orders would be successful in actual production. That did not happen. Instead, AT&T has been impaired and delayed in implementing its strategy of providing local exchange service through its own facilities.

SBC Pacific bears the burden of showing that its test environment mirrors the production environment. Clearly, it has not done so. Just during the 90-day review period since the filing of SBC Pacific's Application, AT&T has described several examples that make it evident that the test environment fails to mirror production. Specifically, in addition to the failings cited in AT&T's Opening Comments, AT&T has described (in its Reply Comments, Supplemental Comments, and *ex parte* filings) two significant examples occurring subsequent to the filing of the Application that demonstrate that the test environment does not mirror production. SBC has neither disputed the accuracy of these examples, nor demonstrated that they are isolated incidents. To the contrary, AT&T's cumulative experience with SBC Pacific's test environment demonstrates serious, fundamental flaws in Pacific's systems that will significantly delay facilities-based voice and DSL competition in California. For these reasons, the deficiencies in the test environment, by themselves, require denial of SBC Pacific's Application.

Respectfully submitted,

/s/ Richard E. Young
Richard E. Young

[12] *CPUC 2002 271 Order* at 226.

ATTACHMENT 1

[redacted]

In May 2001, a cross functional/departmental team was chartered to develop a Provisioning process for UNE-L to UNE-P conversion orders. This process was tested by a manual trial conducted with a selected ILEC partner. The manual trial process, with the initial customer base of 12 orders/39 lines, was initiated on May 31st and concluded on the conversion date of June 25th. The conclusion of this trial resulted in the successful conversion of 9 orders/27 lines. The remainder of this report contains:

- The detailed process steps and their respective results.
- The user requirements and assumptions for PME/BIC architecture.
- Authors/team members.

[redacted]

The initial process document for the manual migration was revised and documented into Methods & Procedures (M&P) titled,' All In One UNE-P to UNE-L Conversion Process for Southwestern Bell'. The assumptions for the conversion trial were:

1. Customers used for the trial will not be included in the UNE-P-VM offering of May 18th.
2. Partial Port orders will not be included in the manual trial.
3. A customer letter will be sent prior to conversion informing customer of system upgrade and possible feature changes.
4. The UNE-L LIFE order creation is a fully automated process, pending systems review.
5. The UNE-L LIFE order will have an unique Originator's Id and Sales Center Id for easier identification purposes for OFC, MACD, & Maintenance.
6. The UNE-L LIFE order creation date will be the start of the Blackout period for additional feature changes.
7. Inventory of the selected collocation would be fully scrubbed prior to the trial.
8. Harris Test Set is installed in the selected collocation.
9. The LEC function would be coordinated with Large Project Methodology.
10. Post activation support of converted customers will be the published. Process documentation for MACD & Maintenance for UNE-L/AIO customers.
11. City Operations will provide Collocation support for the trial.
12. LIFE billing process will be resolved manually for the trial only. Will need systems solution going forward with subsequent trials/production.
13. Product Management will define LSO for trial.
14. The CCNA of the Disconnect ASR will be –74 for the trial only. A request for a new CCNA for UNE-P Conversion ASRs will be requested for easier identification.

The documented process steps are numbered below, with the results listed in red and shaded.

3.1.0 Begin Process

Select area and begin conversion process

All UNE-P LIFE orders had to be in status 8.9, Inventory Complete – Billing Confirmed. Three orders were in a status 8.2, Inventory Complete – Legacy Accepted. Two of the orders could be moved immediately to status 8.9. The team issued a trouble ticket on the third order, which was not status to 8.9 until after the completion of the trial. The order was erred in CADM. CADM fixed the error and pushed it through so billing could complete and LIFE status moved to 8.9.

3.1.1 Validate Capacity and Provisionable Status for Selected Area

Provisioning will determine what collocates are available with adequate capacity to support a conversion. This is done by reviewing the DLC capacity in ALI as well as checking the current category in the S&P tool. The category in S&P must be 2 (DLC available and provisionable) in order to proceed.

The S&P team changed our first selection to the category 3, ALS network collocation without DLC. This means ALS is collocated with the LEC from the customer serving LSO, but does not have the ability to provision unbundled loops. We were unable to determine the reason for the change so the team selected another collocation.

3.1.2 Select Collocate for Conversion

After identifying the customer base in the given area, a collocation will be selected based on provisioning criteria. The collocation selected must have an adequate amount of customers to support a conversion.

The trial criterion was 25 lines to be converted from UNE-P to UNE-L. Our trial orders initially had a count of 39 lines. One order (four lines) was removed from the list prior to step 3.1.3 because the customer was a SBWT Winback.

3.1.3 Compare Provisioning Customer Information to BCAPPS

Provisioning will work with the OFC to acquire a list of local UNE-P customer from BCAPPS. This data will be used to establish customer feature information and to validate that the customer is active in both the provisioning systems as well as the local billing systems.

The team had estimated one day for the BCAPPS-L data run, but the data pull took 1.5 days to complete the task. The data was pulled from the back-up BCAPPS-L DB, after a table refresh (about 20 tables) was completed. It took one day to create the specific data for the manual trial.

One order had Voice Mail listed as a feature [Assumption Set #1]. The team removed the VM feature after research concluded that it was on the order in error.

One order had two distinctive ring features on one line. Process is that there is one distinctive ring feature per line. It was determined that the initial UNE-P orders did list the first distinctive ring feature based on UNE-P request and SWBT verified that the DR TN in their switch. However, neither DR TN was provisioned by SWBT or listed in their records as a current feature for the customer. The customer was unaware that his DR TN features were not working until discovered by this trial. SWBT requires the distinctive ring feature to be provisioned as a separate LSR as a Port only request for regular new UNE-L request. There is not a current process to convert UNE-P DR features to UNE-L customers. This order was removed from the conversion trial. GAP: Distinctive Ring Telephone feature can not converted from UNE-P customers to UNE-L customers. This process will need LSAM resolution.

Three orders had the billing address listed for the service address in the LIFE field section. BCAPPS-L supplies both the billing and service address. These orders were corrected when the manual UNE-L ASRs (non-One Touch) were built for the trial. Validation of the BCAPPS-L supplies both the billing and service address. If a separate address is entered through LIFE for billing and service address, it is populated as such. If only the billing address is entered, it is used as the service address.

3.1.4 Create LIFE Order Using Automated Tool

Provisioning will create a new LIFE order with the UNE-L connectivity option. In order to identify these orders as part of a conversion they will have specialized originator and sales ID's.
Originator's ID: **unelmigratn**
Sales Center ID: **conv**
The orders will then be placed in LIFE status 2.1.

Due to time constraints of the development team for the LIFE automated builder, Orlando Provisioning manually created LIFE orders. The four-person team created eleven orders in approximately five hours. The UNE-P LIFE order was compared to the BCAPPS-L data, and then copied to the UNE-L LIFE order.

3.1.5 Scrub 2.1 conversion orders

Provisioning will access the LIFE orders in 2.1 and perform the standard 2.1 scrub including MSAG validation. At this time the agent must validate that the customer location address is accurate by verifying in ASR that there have been no move requests. At this time the agent should also verify that any feature additions reflected in ASR are reflected on the conversion LIFE order. CSR's must be pulled to determine the number of ASR's to be created in order to satisfy the Southwestern Bell requirement of 1 LSR per CSR. The LIFE order will then be moved to 3.0.

Three orders had the features placed on the wrong line. Mesa Provisioning compared the original UNE-P request against the discrepancies to validate the features.
One order had a feature that not in BCAPPS that was requested by MACD order. The MAC order (Daly0104748) was created on 5/24/01 with a soc back on 5/29/01. The ASR didn't complete out until 6/12/01. This order was pending when BCAPPS-L was pulled in the data run of 6/4.

3.1.6 Create ASR

A manual ASR will be created per the current ASR process.
http://ncscweb/Process/Website/Index/EndtoEndProcess/Seamless/OrderEntry/22510.pdf
Once the ASR's are created the agent will need to go back into each ASR via Order update to note the related PON (RPON). This is the method that will be used to relate all the ASR's for each LIFE order.
Example: A three-line life order may have 3 separate CSR's. The agent will need to create 3 ASR's to drive the separate LSR's required by SWBT. In order to relate these ASR's we will update the RPON on the first order with the ASR number for the second order. The second orders RPON will be the third orders ASR number. The final ASR will have the first orders ASR number for an RPON.
The agent will populate the FOC event since there will not be a FOC call performed for the conversion.
All ASR number must also be noted in the LIFE order remarks.
The LIFE Order will then be moved to 5.0

The original Manual Trial process had the UNE-L LIFE orders go through the Work Task Manager (One Touch) for task automation. One Touch creates one ASR per Order, which does not connect with SWBT's UNE-P process of one LSR per Customer Service Record. Initially SWBT agreed with our one-to-one Process and the team sent one LSR per UNE-L OT ASR. Those orders were rejected by SWBT's system edits. LSAM verified that SWBT has that requirement for their internal orders. Mesa Provisioning cancelled the UNE-L OT ASRs and built UNE-L Y ASRS. The UNE-L Y ASR circuit ids were created with a "-Y" at the end, i.e." 07-201-333-4444-1". Documented process is to add a "-1" to the end of the circuit id, when it was used previously in another order.

This circuit id with the alteration can be accessed in ASR GUI and MDS screen in ALI.

To test our original Manual Migration Process, Orlando Provisioning conducted the following test with ASRs:

1. Build a UNE-P ASR and move it to ACTIVE status.
2. PRM a UNE-L LIFE order to build an UNE-L One Touch ASR against the same circuit id.

The purpose of this test was to verify if WTM would build an ASR against an active circuit id. If this test were not successful, our process would be changed to alter the UNE-P circuit id so the UNE-L OT ASR could be built. This test was successful. A One Touch ASR can be created against an Active circuit id.

3.1.7 Complete translations

The translations will be manually entered using Connect-Vu. The associated process documents are located at the following URL:
http://ncscweb/Process/Website/Index/EndtoEndProcess/Seamless/Switch/index.html

This step was completed according to process.

3.1.8 Scrub and Verify LSR data

The agent will need to pull all related orders before sending the LSR's. An LSR will be sent for each ASR/CSR using the current customer information in LIFE. This differs from the current process where the CSR is used as a tool in creating the LSR. The CSR's will not be adequate sources of information because the customer specific data is changed at the time of UNE-P conversion and we will only receive a generic Reseller CSR from the LEC identifying AT&T as the customer.
This step was completed according to process.

3.1.9 Create and send LSR

Using LEX, SWBT's LEC interface system, the agent will create and submit the LSR to the LEC. When the LSR is sent successfully the agent will populate the LSR event in ASR. Access the following URL for the current LEX LSR process:
http://ncscweb/Process/Website/Index/EndtoEndProcess/Seamless/LECInterface/LSR/17249.pdf

SWBT stated in pre-trial discussions that the LSR request should be submitted as a CHANGE request. SWBT Instructions: the REQTYP "A", ACT "V". This is still a conversion with change, UNE-P to UNE-Loop. Mesa Provisioning submitted the LSR requests as a NEW request.

3.1.10 Reject Received

If the ILEC rejects for IDLC, partial port or pending service orders, these orders will be removed from the conversion project and remain on UNE-P. Any other reject reason, correct order and proceed.

Two LSRS were rejected because of order entry error. The requests were corrected and resubmitted to SWBT.

3.1.11 Receive LSRC from Lec

The agent will pull the work list for LSRC and log all LSRC's received from the LEC. If the LSRC is not received follow current escalation process with the LEC. The LSRC event in ASR will be populated or jeop'd according to the current process.

SWBT requested that AT&T submit 9 lines per LSR request to be staggered in half hour increments for the trial. The LSRCs were received as 'jeopardy' because of the non-standard start time request of 5:00AM CST (3:00AM Mesa). SWBT corrected the jeopardy manual to reflect the requested time and resent the LSRCs as a valid FOC date. Some orders were rejected because more than nine lines were submitted for the 5:00am CST time slot. AT&T LEC agent corrected those orders and re-submitted to SWBT for a valid FOC date.

3.1.12 Send LNP Create Message to NPAC

Follow current LNP process for sending a create message to NPAC. This initiates the number porting from the LEC to AT&T.

This step was completed according to process.

3.1.13 Check LNS Collocation for Dial Tone

The provisioning group will coordinate with local city operations to test for dial tone at the LNS DLC. All lines that are scheduled for UNE-L conversion must be tested at least five days prior to the conversion date to allow for facility assignment changes.

City Operations reschedule our appointment three times and finally conducted the test on Thursday, June 21st, two business days prior to conversion. The process requires that City Operations test the collocation seven days prior to conversion. The City Operations Technician did not find all the problems initially and required a second visit prior to the ILEC visit.

3.1.14 If no dial tone is found

LNS provisioning will check the translations in the switch if there is no dial tone found by city operations.

All lines were tested good dial tone in the first City Operations visit to the co-location site.

3.1.15 Are translations correct

If the translations are correct city operations will check the POTSBAY for equipment problems. If no equipment problems are found it will be necessary to either send a change of facility supp to the lec via an LSR or cancel the order and leave the customer on UNE-P.

All lines were tested good dial tone in the first City Operations visit to the collocation site.

3.1.16 Send Customer Letter

A letter will be sent to the customer to inform them of a system upgrade and possible feature changes.

One known customer did not receive the 'system upgrade' letter, which impacted the customers' call forwarding features.

3.1.17 Run Harris test

Perform Harris CO-tani test to verify dial tone from switch and telephone number.
http://ncscweb/Process/Website/Index/EndtoEndProcess/Seamless/ExtendedProvisioningMaintenance/17115.pdf

In conducting this step, MPC found no dial tone on one order that was not identified in step 3.1.13. This test result required a second visit by City Operations.

3.1.18 ILEC test completed

The ILEC will perform a dial tone test prior to the date of conversion (two days or as negotiated by LSAM).

SWBT reported all lines with good dial tone with the exception of one line. This line had previously been reported with dial tone by the City Operations technician. Mesa Provisioning changed the cable and pair in ALI and Switch as opposed to a vendor meet.

3.1.19 No Dial Tone Condition Found

If a no dial tone condition is found, city operations will need to be dispatched to perform a vendor meet with the LEC to correct the problem. It may be necessary to change the cable and pair for the associated TN.

3.1.20 Create Disconnect ASR Orders

The disconnect ASR will be created using the special conversion CCNA of M92 for Mesa orders for O92 for Orlando orders. This ASR is for record purposes only.

The nine Disconnect ASRs were created per customer order under the CCNA of M92i .

3.1.21 Modify the ASR PON on the UNE-L ASR Orders

The PON number of the UNE-L ASR is modified to reflect that the order is a conversion ASR. The PON will be changed from 'LIFEOR' to 'ULCONV'.

This process was completed according process.

3.1.22 Test & Turn-Up

Perform test and turn-up with the LEC. If any lines do not have dial tone, the conversion will be cancelled and the lines will be left on UNE-P.

SWBT requested to turn up nine lines per half hour but all lines were provisioned within one hour.

3.1.23 Send LNP Activate Message

Using current LNP processes, the agent will send the activate message to NPAC using LNP SMS.

The LNP-SMS system was off line due to an application upgrade and the alternate system, Lo-Tech, was non-supported and not accessible at conversion time. Mesa Provisioning contacted NPAC to have the lines activated by them. This was solely an AT&T issue.

3.1.24 Conduct Harris Test – Full on all lines to verify Dial tone.

The provisioning agent will conduct a Full Harris Test to verify each line is operational with good dial tone. If a problem is identified when the Harris Test is complete, the Provisioning agent will notify ILEC Coordinator/Frame to validate ILEC provisioning.
If Provisioning and ILEC cannot resolve the problem, the ILEC moves the customer back to avoid out-of-service condition. The final order outcome will be determined at a vendor meet the following business day between City Ops and ILEC. If not resolved, order will be rescheduled for the next conversion date.

SWBT allows Mesa Provisioning to request a single pair change per order in a no dial tone condition at time of conversion. In this scenario, SWBT will change the pair at the Frame and AT&T submits a new LSR to validate the change.

SWBT's Universal Pair Gain is compatible to AT&T Switch and does not require the line to be moved to copper prior to conversion. The five orders that were on Universal Pair Gains reported '400 feet out' on the Harris Test results. Mesa Provisioning had SWBT verify the dial tone and conduct test calls to check access to the customer. The Harris Test results were incorrect on the Universal Pair Gain orders.

3.1.25 Move Disconnect ASR to "D" Status in ASR

Once the conversion has completed and the UNE-L ASR orders are moved to "A" status, the disconnect orders will need to be completed and moved to "D" status signifying that the customer is no longer on UNE-P and is now an AT&T UNE-L customer.

This process was completed according process.

3.1.26 Move New ASR to "A" Status in ASR

Once dial tone has been confirmed the all related ASR's would need to be moved to "A" status in ASR

This process was completed according process

3.1.27 Move LIFE order to 6.0

Manually update LIFE order to 6.0

This process was completed according process

3.1.28 Complete and transfer Martin Order

All martin orders for lines converted must be committed and transferred in Martin using current Martin process.

This process was completed according process

3.1.29 Update Life Order to 7.0

Manually update LIFE order to 7.0. Provisioning is now complete

This process was completed according process

3.1.30 OFC Manually Update LIFE to 8.9

The OFC will manually update the LIFE order and clear all system generated errors caused by the second conversion LIFE order.

This process was completed according process

Final results: Three orders were removed from test. Two orders were SBWT winbacks and were removed from the trial. The third order was removed because the order had two distinctive ring telephone numbers on the main customer line. The current UNE-P process allows only one distinctive ring feature per line. One trouble ticket resulted from the conversion. The problem was humming on the line, which was referred to and resolved by the Customer Maintenance Center.

[redacted]

1. Selection process of a list of active UNE-P customers based on the PSR database.
   - Product has ownership of this automation request.

2. Creation of a customer order for UNE-L conversion.
   - This process should be an automated download from the PSR database.
     - Requirement #1: Provisioning should have the ability to remove orders that are related to customer moves, non-pays, and customer-requested disconnects from the UNE-L conversion line up.
     - Requirement #2: A process that would not allow changes or updates to the customer order (with the exception of requirement #1) when the UNE-L conversion order has been created.
     - Assumption: All DADL listing change request will be completed after the conversion.

3. Automated scrub against pending orders for additional feature requests to be added onto new conversion orders.
   - Assumption: PSR database will have the most current customer record on file.

4. The build of the ASR and status changes (i.e. move the ASR into A status) is an automated function.
   - Requirement #1: The orders will be recognized as conversions, not new adds.
   - Requirement #2: Upon completed conversion, the connectivity should change from UNE-P to UNE-L for Provisioning and Maintenance records.
   - Assumption: The data update to show the customer is not on UNE-P depends on the progress of the PME build.

5. The build of the translations for the order's feature set is an automated function.
   - Assumption: If PME is not at the right stage of development, One Touch/WTM (or another application/system) will be used as a contingency system.

6. The creation and activation of the LNP function is an automated function.
   - Assumption: If PME is not at the right stage of development, One Touch/WTM (or another application/system) will be used as a contingency system.

7. The Harris Test Set is an automated function.
   - The Harris Test Set should be a automated function for all orders so agents will can test all orders in the conversion set at one time in a bulk manner.

8. The Martin billing of the order is an automated function.
   - Assumption: If PME is not at the right stage of development, One Touch/WTM (or another application/system) will be used as a contingency system.

9. Bulk reserve ports for the bulk conversions.

Provisioning "wish list" for future development:
[This item is listed for future development since the LEC gateway application will not be in scope until the end of the BIC/PME development. Automated LEC functionality should be discussed as a requirement if the development timeline is moved up earlier.]

The ordering and confirmation of the ILEC facilities is an automated function.
- The LSR document creation would be built based on the customer order and ILEC system edits.
- The LSR Confirmation of the order request will update the critical events and log notes of the customer order.

[redacted]

Authors/Contributors to the UNE-P to UNE-L Conversion Process:
- Larry Walters, Mesa Provisioning Center.
- Owen Hostetler, Orlando Provisioning Center.
- Alencia DeAnda-Davidson, Process-Seamless/All In One
- Debra Turner-Kelly, Process-New Products
- Linda Pedersen, Mesa Provisioning Center
- Elisabeth Zalewski, LCIO-Systems
- Donna Irlbacher, UNE-P Product Owner
- Paula Molina, AIO ETE Process
- Maria Hollifield, BMOPR Local Maintenance Process & Planning
- Brenda Sprinkle, OFC - Process
- Patty Wyatt, MACD-New Initiatives
- Paul Baratelli, LCIO-Architecture Planning
- Linda Warren, LSAM – National
- Mark Van De Water, LSAM – SWBT, SBC, PB, SNET
- Michelle Navarro, DADL Process
- Terri Mc Lane, DADL Process
- Thomas M Kelly, Provisioning Systems Realization
- Shirley Tonstad, LNS Provisioning
- Steve Lauderdale, LCIO – Systems

ATTACHMENT 2

From: TEMPLE, MELONIE (SWBT) [mailto:mt0902@sbc.com]
Sent: Thursday, December 05, 2002 11:14 AM
To: Willard, Walter W (Walt), NCAM; WEHL, ARTHUR A (PB)
Subject: RE: UNE-P to UNE-L test case 5.1

Arthur
Walt -

I've referred this again internally.....this test case example may get down to nothing more than an oversight or deviation in test?? Walt are you of the belief that because this one scenario passed in test that it should be accepted in production??

I'm seeking to understand why you (as well as Pat a couple of weeks back) make reference to this one example.

Mel

Melonie Temple
Account Manager - Industry Markets
SBC Commu nications, Inc.
214.464.3967

> -----Original Message-----
> From: Willard, Walter W (Walt), NCAM [mailto:wwillard@att.com]
> Sent: Wednesday, December 04, 2002 7:03 PM
> To: WEHL, ARTHUR A (PB)
> Cc: TEMPLE, MELONIE (SWBT)
> Subject: UNE-P to UNE-L test case 5.1
>
> Arthur,
>
> We have recovered the EDI that we sent for the test case 5.1 and the
> response we received from Pac Bell. I'm confident your SME's will agree
> that the test case was ordered as a UNE-P to UNE-L xDSL migration and that
> SBC/Pacific Bell confirmed that order.
>
> Thanks,
>
> Walt
> << File: ca_unep_unel_5.1.edi.txt >> << File:
> pb.D1021008.T225204.resp.txt >>